

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Lori Saroya,

Case No.: 24-cv-110 (DWF/DTS)

Plaintiff,

v.

CAIR Foundation, Inc. d/b/a Council on
American-Islamic Relations & CAIR,

Defendant.

**DECLARATION OF
STEVEN C. KERBAUGH IN
SUPPORT OF PLAINTIFF LORI
SAROYA'S REPLY TO HER
MOTION TO AMEND THE
COMPLAINT**

I, Steven C. Kerbaugh, hereby state and declare as follows:

1. I am an attorney with the law firm Saul Ewing LLP (“Saul Ewing”), counsel of record for Plaintiff Lori Saroya (“Saroya”). I make this declaration in support of Saroya’s Reply to her Motion to Amend the Complaint. The following is true and correct to the best of my knowledge, information and belief.
2. Attached hereto as **Exhibit A** is a proposed order relating to jurisdictional discovery.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on January 3, 2025, in Minneapolis, Minnesota.

/s/ Steven C. Kerbaugh
STEVEN C. KERBAUGH